Via Electronic Filing

September 9, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: *ET Docket No. 13-44; RM-11652; RM-11673; WT Docket Nos. 07-250 and 10-254*

Dear Ms. Dortch:

On Friday, September 6, 2013, the Telecommunications Industry Association ("TIA") met with Federal Communications Commission ("Commission") Office of Engineering and Technology ("OET") Laboratory staff, at the OET Laboratory in Columbia, MD. In attendance on behalf of TIA was: Brian Scarpelli, TIA; Chuck Eger, Motorola Mobility and TIA Technical Regulatory Policy Committee[1] ("TRPC") chair; Aya Kiy, Blackberry; Ben Botros, Panasonic; and Rob Kubik, Samsung. In addition, the following TIA members partook in this meeting via conference call: Roy McClelland, Cassidian; Dave Case, Cisco; Praveen Rao, Fujitsu Australia; Bob Speidel, Harris; John Lewczak, Motorola Mobility; Mike Ramnath, Motorola Solutions; and John Forrester, Qualcomm. Attendees from the Commission included Rashmi Doshi, OET Laboratory Division Chief; William Hurst, OET Laboratory Division Technical Research Branch Chief; Mark Neumann, OET Laboratory Division Equipment Authorization & Compliance Branch Chief; and Kwok Chan, OET Laboratory Division Technical Research Branch.

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[1]   TIA's TRPC advocates public policy positions related to the streamlining clarifying the mechanisms of the FCC equipment certification processes and procedures through interaction with the Federal Communications Commission (FCC), its Office of Engineering and Technology (OET) and its Laboratory, and other governmental bodies, including but not limited to those issues which are affected by related TIA standardization activities. *See* http://www.tiaonline.org/policy/tia-policy-committees-divisions.

TIA discussed the issues which are noted in the attached presentation slides. Specific to the above open-noted open dockets, during this meeting, TIA discussed:

- TIA views on the recent OET Laboratory Division draft Knowledge Database ("KDB") Attachment 285076 D02 T-Coil testing for CMRS IP v01 (Guidance for Performing T-Coil tests for Air Interfaces Supporting Voice over IP (e.g. LTE and Wi-Fi) to support CMRS based Telephone Services),[2] communicated to the OET Laboratory Division on August 16.[3] TIA also discussed the state of hearing aid compatibility testing configuration availability with the attendees.

- TIA's pending request for the Commission to ease technical and logistical burdens on manufacturers while increasing end user access to useful information about their devices by allowing for the non-exclusive option of electronic labeling.[4] As we discuss in the TIA eLabeling Petition, electronic labeling is becoming a natural progression from hard copy labels which would help in streamlining and lowering costs in the manufacturing process, eliminating typographical errors which sometimes appear on hard copy labels, and improving the approval processes by providing ease of access to information for the various constituencies in the device approval process, including the Commission. Since being placed on Public Notice, the TIA eLabeling Petition has seen no opposing statements, and we look forward to the Commission taking further steps in the regulatory process as expeditiously as possible, including further public input. We urge that the Commission consider addressing the topic through the open device approval reform docket,[5] in which TIA has submitted detailed comments.[6]

- TIA also noted that it is a liaison between the TCB Council[7] and the ICT manufacturer and vendor community, and presents to the TCB Council members on emerging trends and issues at the twice-annual TCB Council Workshops, which occur in April and October each year in Baltimore, MD. TIA discussed its and the OET Laboratory Division's priorities for the upcoming workshop.

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[2]   *See* https://apps.fcc.gov/eas/comments/GetPublishedDocument.html?id=339&tn=596089.

[3]   *See* Comments on TIA, WT Docket Nos. 07-250 and 10-254 (filed with OET KDB comment system Aug. 16, 2013; submitted by Commission staff to ECFS under WT Docket Nos. 07-250 and 10-254 on Aug. 26, 2013).

[4]   *See* Petition for Rulemaking, Telecommunications Industry Association, RM No. 11673 (Aug. 6, 2012) ("TIA eLabeling Petition").

[5]   *See* Amendment of Parts 0, 1, 2, and 15 of the Commission's Rules regarding Authorization of Radiofrequency Equipment Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications Certification Bodies, ET Docket No. 13-44, RM-11652, (rel. Feb. 15, 2013).

[6]   *See* Comments of TIA, ET Docket No. 13-44, RM-11652 (Jun. 17, 2013).

[7]   The TCB Council is a non-profit entity that provides a forum for periodic dialogue between the FCC and the TCB's and to facilitate on-going activities geared toward the improvement of TCB technical and administrative performance. *See* http://www.tcbcouncil.org/.

Pursuant to the Commission's rules,[8] this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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September 5, 2013

cc: Rashmi Doshi, OET Laboratory Division Chief
        William Hurst, OET Laboratory Division Technical Research Branch Chief
        Mark Neumann, OET Laboratory Division Equipment Authorization & Compliance
        Branch Chief
        Kwok Chan, OET Laboratory Division Technical Research Branch

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[8]   47 C.F.R. § 1.1206.

TIA Meeting with FCC Office of Engineering and Technology (OET) Laboratories

FCC Labs – Columbia, MD

September 6, 2013

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Agenda

- **Introductions**
- **Background on TIA & Overview of TIA's Technical Regulatory Policy Committee (TRPC)**
- **Discussion**
  - **Various Draft/Final KDBs**
  - **Hearing Aid Compatibility (HAC) Testing**
  - **Testing of 3rd Party Accessories**
  - **FCC ID Process**
  - **Electronic Labeling**
  - **October TCB Council Workshop**
- **Other?**
- **Adjournment**

Various Draft/Final KDBs

- **OET Lab KDB 285076 D02 (T-Coil testing for CMRS IP) – attestation requirement**
- **Other?**

Hearing Aid Compatibility (HAC) Testing

- **In previous meetings with OET Labs, TIA was asked about whether VoLTE/WiFi-enabled calls are able to switch to/from CMRS and unlicensed, and how this will affect HAC responsibilities that only apply to CMRS.**
- **TIA has conferred on this issue since our last meeting when this question was raised.**
  - **While 3GPP defines a dBm for VoLTE, and the C63.19 standard defers to network providers or carriers, there is not currently a consensus manufacturer understanding on how networks will handle this, what servers these calls will terminate on, if the testing software stack can reflect all supported configurations, etc.**
  - **Under existing KDBs, we believe that companies have certainty that they can deal with the FCC regarding compliance in this area on a product-by-product basis until there an industry consensus emerges and is realized in the development of standards.**

Testing of 3rd Party Accessories

- **In our previous meeting, the Labs noted an issue in attaining cooperation from third party accessory makers with respect to testing.**
  - **The Labs requested that OEMs consider utilizing their relationships with active third party accessory makers to ensure cooperation with the already-used TCB for full testing and grants.**
  - **The Labs suggested that the relationship between OEMs and app software developers could serve as a model for this.**
- **TIA volunteered to look at the third party accessory market and to evaluate how companies handle accessories, circling back with the Labs.**

Testing of 3rd Party Accessories

- **In July, TIA convened its TRPC members to discuss the issue, concluding the following:**
  - **There are jurisdictional limitations in forcing third party accessory manufacturers to cooperate with TCBs.**
  - **Manufacturers' relationships with application developers are dissimilar to the manufacturer-accessory maker relationship because accessory programs are proprietary and outside of the control of manufacturers, unlike the manufacturer-app developer relationship. Manufacturers cannot know of and control all accessory makers' development of their products, and the issue of proprietary testing software of manufacturers (which needs to remain closely held) is also implicated.**
  - **Manufacturers lack a business motivation to require of accessory developers that they cooperate with original-grant TCBs.**

FCC ID Process

- **Currently, hardware changes outside of Class 1 & 2 permissive allowances require attaining a new FCC ID.**
- **TIA believes that it would be beneficial to allow for the approval of a device, with one FCC ID, with the capability to use multiple frequencies.**
  - **The resulting ID process would remove the burdensome requirement of getting high numbers of FCC IDs for one device.**
  - **This device would be disabled from using its ability to use non-licensed frequencies.**

Electronic Labeling

- **Background:**
  - **In August 2012, TIA formally petitioned the FCC to allow for the non-exclusive option of electronic labeling.**
  - **In short, we believe that this option would ease technical and logistical burdens on manufacturers while increasing end user access to useful information about their devices.**
  - **The item was later put on Public Notice, and saw no opposing comments. It has not yet been assigned a docket number.**
  - **This request was not addressed under the broader docket for device approval process reform, though TIA requested that in its comments for that matter.**
- **TIA believes that the FCC should move forward as quickly as possible to address the requested non-exclusive allowance of eLabeling in the United States.**
- **Can TIA provide anything further to address concerns, speeding the regulatory process in this matter?**

October TCB Council Workshop

- **TIA is scheduled to present to the TCBC Workshop in October on day 1 (October 22).**
- **We are tentatively planning to address changes in unlicensed technologies and standards that will have an impact on the TCBs.**
- **What are the FCC's priorities for the October workshop?**

Other?

Thank You!

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